

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195-SHS

Hon. Sidney H. Stein

NOTICE OF OBJECTION TO DISCOVERY ORDERS AT ECF 352-53

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, accompanying exhibits, and all pleadings and proceedings referenced therein, Defendant OpenAI¹ moves this Court, before the Honorable Sidney H. Stein in Courtroom 23A of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007, for an order pursuant to Federal Rule of Civil Procedure 72(a) setting aside the discovery orders at ECF 352-53 and directing Plaintiff The New York Times Company to produce the discovery requested herein, and any such other further relief as this Court may deem just and proper.

¹ “OpenAI” refers collectively to Defendants OpenAI, Inc.; OpenAI LP; OpenAI GP, LLC; OpenAI, LLC; OpenAI OpCo, LLC; OpenAI Global LLC; OpenAI Corporation LLC; and OpenAI Holdings, LLC.

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Dated: December 23, 2024

By: /s/ Andrew F. Dawson

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